

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOE BOY a.k.a
CLINTON FRENCH, a.k.a.
CHRISTOPHER WILLIAMS CLEMONS,
a.k.a. CHRIS CLEMONS,
a.k.a. CHRIS COLLINS,
Defendant.

Criminal Action No. 99-82-GMS

**RESPONSE BY UNITED STATES
TO DEFENDANT'S MOTION TO CORRECT NAME
LISTED IN JUDGMENT AND COMMITMENT**

NOW COMES the United States of America, by and through its counsel, Colm F. Connolly, United States Attorney and Robert J. Prettyman, Assistant United States Attorney and respectfully responds to the Defendant's Motion to Correct Name Listed in Judgment and Commitment. In response, the United States respectfully alleges:

1. On November 23, 1999, the federal grand jury for the District of Delaware indicted the defendant under the following names: DOE BOY a.k.a CLINTON FRENCH, a.k.a CHRISTOPHER WILLIAMS CLEMONS, a.k.a CHRIS CLEMONS, a.k.a. CHRIS COLLINS in the above case. *See* Docket Item 1.

2. On December 12, 2000, then U.S. District Court Judge Roderick R. McKelvie signed the Judgment in the above case. *See* Docket Item 42. The caption of the Judgment recites the defendant's name as follows: Clinton French a.k.a Doe Boy, a.k.a. Chris Clemons, a.k.a. Christopher Clemons. *Id.* The heading of the next three pages of the Judgment recites the defendant's name in the same manner, but the heading on the remaining pages of the Judgment states the defendant's name as "Clinton French a.k.a Doe Boy." *Id.*
3. The United States does not oppose the correction of the clerical errors in the Judgment so that all pages of the Judgment reflect the names of the Defendant as recited in the Indictment. *See* Fed. R. Crim. P. 36.
4. However, the Defendant has not cited any authority to support his request for: 1) the replacement of the name of Clinton French with that of Christopher William Clemons, 2) the record in the above case to show that the defendant's true name is Christopher Williams Clemons, not Clinton French, and 3) the Court to sign an Order that the institutional identification of the defendant should be changed to reflect that the defendant's true name is Christopher Williams Clemons, not Clinton French (*see* Docket Item 101) and the United States respectfully opposes that request.¹

Wherefore, for the above stated reasons, the United States respectfully does not oppose the correction of the clerical errors in the Judgment so that all pages of the Judgment reflect the

¹The Defendant alleges that the United States Attorney's Office for the District of Delaware confirmed that he is Christopher W. Clemons by way of fingerprints, photo identification and NCIC. *See* Docket Item 101, p.3. It is my understanding that fingerprints and NCIC merely show that a person uses that name and not that the name is the person's true name. In fairness to the Defendant, it should be noted that the Defendant used the name Christopher Clemons during the above-captioned prosecution. *See, e.g.,* Docket Item 1 (Defendant signed the name Christopher Clemons when he entered his not guilty plea to the Indictment).

names of the Defendant as recited in the Indictment, but otherwise respectfully requests that the Court deny the Defendant's motion.

Respectfully submitted,

COLM F. CONNOLLY
UNITED STATES ATTORNEY

By



Robert J. Prettyman
Assistant United States Attorney

Date: August 6, 2008

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FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)	
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Plaintiff,)	
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v.)	Criminal Action No. 99-82-GMS
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DOE BOY a.k.a)	
CLINTON FRENCH, a.k.a.)	
CHRISTOPHER WILLIAMS CLEMONS,)	
a.k.a. CHRIS CLEMONS,)	
a.k.a. CHRIS COLLINS,)	
Defendant.)	

CERTIFICATE OF SERVICE

I, Michael Bileci, an employee of the United States Attorney's Office for the District of Delaware, hereby certify that, on August 6, 2008, two copies of the foregoing **RESPONSE BY UNITED STATES TO DEFENDANT'S MOTION TO CORRECT NAME LISTED IN JUDGMENT AND COMMITMENT** were mailed, via United States Mail, first class, postage prepaid to:

**DOE BOY a.k.a
CLINTON FRENCH, a.k.a.
CHRISTOPHER WILLIAMS CLEMONS,
a.k.a. CHRIS CLEMONS,
a.k.a. CHRIS COLLINS
Reg. No. 04164-015
F.C.I. McKean
P.O. Box 8000
Bradford, PA 16701**



Michael Bileci